

RIKER DANZIG SCHERER HYLAND & PERRETTI LLP
Headquarters Plaza
One Speedwell Avenue
Morristown, NJ 07962-1981
(973) 538-0800
Attorneys for Defendants Chicago Title
Insurance Company
Federal Bar No.: MO-7088

DARE INVESTMENTS, LLC, a Utah limited
liability company,

Plaintiff,

vs.

CHICAGO TITLE INSURANCE COMPANY, a
Missouri domiciled insurer; HORIZON TITLE
AGENCY, Inc., a New Jersey domiciled company;
CHICAGO TITLE RICO ENTERPRISE, a
racketeering enterprise,

Defendants.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Case Action No.2:10-CV-06088(DRD)(MAS)

**NOTICE OF MOTION FOR REVOCATION
OF PRO HAC VICE ADMISSIONS AND
DISQUALIFICATION OF COUNSEL**

**MOTION RETURN DATE:
JANUARY 17, 2012**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that on January 17, 2012, at 9:00 in the morning, or as soon thereafter as counsel may be heard, Riker Danzig Scherer Hyland & Perretti LLP, attorneys for Chicago Title Insurance Company ("Chicago Title"), shall move before the Honorable Dickenson Debevoise, U.S.D.J., at the United States District Court for the District of New Jersey in Newark, New Jersey, for an Order revoking the pro hac vice admissions of Peter Strojnik, Esq. and Peter K. Strojnik, Esq. and disqualifying Christopher Humphrey, Esq. from representing Plaintiff Dare Investments, LLC ("Dare") in this action.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the accompanying Brief in Support of Motion for Revocation of Pro

Hac Vice Admissions and Disqualification of Counsel, the Certification of Michael R. O'Donnell, Esq, with attachments thereto, and the Certification of Derrick R. Freijomil, Esq.; and

PLEASE TAKE FURTHER NOTICE that oral argument is hereby requested only if timely opposition is filed and accepted in this matter.

RIKER DANZIG SCHERER HYLAND
& PERRETTI LLP
Headquarters Plaza
One Speedwell Avenue
Morristown, NJ 07962-1981
(973) 538-0800
Attorneys for Defendant
Chicago Title Insurance Company

By: s/ Michael R. O'Donnell
MICHAEL R. O'DONNELL (MO-7088)

Dated: December 21, 2011